

## **2018 CPNI Certification**

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018

1. Date filed: **02/25/2019**
2. Name of company(s) covered by this certification: **Electronic Specialties, Inc.**
3. Form 499 Filer ID: **812642**
4. Name of signatory: **Jeffrey Mortensen**
5. Title of signatory: **President**
6. Certification:

I, Jeffrey Mortensen, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company *has not* taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company *has not* received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed

A handwritten signature in black ink, appearing to read "Jeff Mortensen", written over a horizontal line.

**Attachments:**      Accompanying Statement explaining CPNI procedures

### **CPNI STATEMENT**

- Electronic Specialties has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").
- Electronic Specialties has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Electronic Specialties continually educates and trains its employees regarding the appropriate use of CPNI.
- Electronic Specialties has established disciplinary procedures should an employee violate the CPNI procedures established by Electronic Specialties.
- Electronic Specialties does not share CPNI information with its affiliates for sales and marketing campaigns.
- Electronic Specialties does not disclose or provide CPNI to third parties and third parties are not allowed access to CPNI.
- Electronic Specialties has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of Electronic Specialties compliance for a minimum period of one year. Specifically, Electronic Specialties sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.
- Electronic Specialties CPNI cannot be remotely accessed and is not connected to the company's local area network.

*The following is a summary of all customer complaints received in 2018 regarding the unauthorized release of CPNI:*

Number of customer complaints Electronic Specialties received in 2018 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: **NONE**

*Category of complaint:*

<u>0</u>	Number of instances of improper access by employees.
<u>0</u>	Number of instances of improper disclosure to individuals not authorized to receive the information.
<u>0</u>	Number of instances of improper access to online information by individuals not authorized to view the information.
<u>0</u>	Number of other instances of improper access or disclosure.

Description of instances of improper access or disclosure: **N/A**